

EXHIBIT A

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----  
ROBERT A. STROMSTED,

Plaintiff,

vs.

HNTB CORPORATION,

Defendant.

: AFFIDAVIT OF JOHN K.  
: PRUTSMAN IN SUPPORT OF  
: DEFENDANT'S MEMORANDUM IN  
: OPPOSITION TO PLAINTIFF'S  
: MOTION FOR A PRELIMINARY  
: INJUNCTION

:  
: Case No.: 11-cv-02023-AKH

:  
: ECF CASE  
:----- X

STATE OF MISSOURI     )  
                              ) SS:  
COUNTY OF JACKSON    )

John K. Prutsman, being duly sworn, deposes and says:

1. I am the Director of Human Resources for HNTB Corporation. I make this Affidavit in Support of HNTB's Memorandum in Opposition to Plaintiff's Motion for Preliminary Injunction.

2. Under the HNTB human resources system, the business title of CEO and the HNTB internal designation of Senior Vice President are not mutually exclusive.

3. Under the HNTB system Chief Executive Officer is a business title. When Robert Stromsted was given the title of Chief Executive Officer he maintained his internal employment designation as Senior Vice President.

4. This dual reference system is consistently utilized within HNTB. For instance, Ken Graham, the Chief Executive Officer of HNTB Infrastructure, maintains the employment designation of Executive Vice President. Terry Miller, the Chief Executive Officer of HNTB Architecture, maintains the employment designation of

Senior Vice President. Terry Campbell, HNTB's Chief Financial Officer, maintains the Senior Vice President employment designation. John Kupke maintains the title of HNTB's Chief Operating Officer but also holds the employment designation of Senior Vice President.

5. After receiving the business title of CEO, Plaintiff continued to receive benefits under the terms of the Senior Vice President Agreement.

6. Pursuant to the Senior Vice President Agreement, after Plaintiff's employment with HNTB was terminated Plaintiff received a severance payment in an amount equal to sixty (60) days of Plaintiff's compensation while Plaintiff was employed at HNTB. This severance payment totaled \$93,440.16.

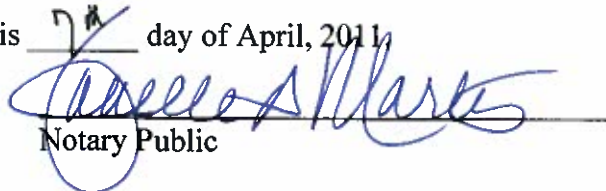
7. Pursuant to the Senior Vice President Agreement, Plaintiff receives bi-monthly severance payments that will equal seven (7) months of Plaintiff's compensation while Plaintiff was employed at HNTB. Each bi-monthly payment is in the amount of \$21,542.40.

Further affiant sayeth naught.



John K. Prutsman

Subscribed and sworn to before this 7<sup>th</sup> day of April, 2011



Notary Public

My Commission Expires:

